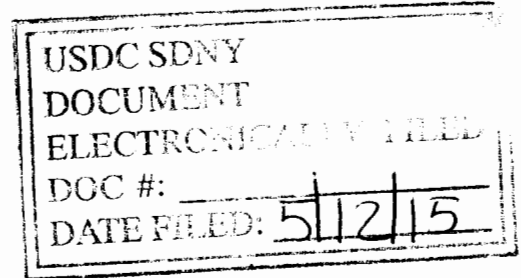


*May 12, 2015*  
*BATS, J*  
*Faint, J*

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

EMMANUEL AGROPONG, MARCOS BASABE, ADRIAN  
 BATANA, CARLOS LAGUNA, YOLANDA NIEVE, CHRISTINE  
 NUNEZ, ANDY OSEI, ABEL PANTOJA, ELIETZER PIERRE-  
 LOUIS, JOSUE PIERRE- LOUIS, DAVID RICHARDSON,  
 DANIEL RODRIGUEZ, ROBERTO RODRIGUEZ, HECTOR  
 ROSADO, and SURITA SUEDASS, individually, and on behalf  
 of all others similarly situated,



Plaintiffs,

-against-

Civil Action No.  
 14-CV-7990

MICHAEL MEMON a/k/a IQBAL MEMON, GULAN DORIA  
 a/k/a JEFF DORIA, BERGEN DISCOUNT INC., BERGEN  
 DISCOUNT PLUS, INC., 518 WILLIS REALTY, INC., WILLIS  
 DISCOUNT INC., ALI M. ABADI d/b/a WILLIS DISCOUNT,  
 ZIAD NASSRADIN, ZNF 99 CENT DISCOUNT CORP., DOLLAR-  
 RITE INC., TODO BARATO DISCOUNT INC., COMMUNITY  
 DOLLAR PLUS, INC., 167 TRADING DISCOUNT INC., 167  
 PRIMO TRADING INC., B&S DISCOUNT INC., 99 CENT  
 DISCOUNT & PARTY STORE INC., 99 CENT DISCOUNT, INC.,  
 CLEAR CHOICE, INC., JOHN AND JANE DOES 1-50, and  
 JOHN DOE CORPORATIONS 1-20,

~~PROPOSED~~ ORDER TO SHOW  
CAUSE FOR PRELIMINARY  
INJUNCTION AND TEMPORARY  
RESTRAINING ORDER

*28*

Defendants.

Upon the affidavits of David Richardson and Pierre-Louis sworn to the 6th day  
 of May 2015, and upon the Declaration of Adam P. Slater, Esq., hereto annexed, it is

ORDERED, that above named Defendants Michael Memon a/k/a Iqbal Memon

and Gulan Dorian a/k/a Jeff Doria personally appear before me and show cause before a motion

term of this Court, at Room 8L United States Courthouse, 500 Pearl Street, in the City,

County and State of New York, on May 21, 2015, at 10 o'clock in the fore

noon thereof, or as soon thereafter as counsel may be heard, why an order should not be issued

pursuant to Rule 65 of the Federal Rules of Civil Procedure enjoining the defendants during the pendency of this action from terminating or suspending or threatening to terminate or suspend any employee, causing any employee to be deported or threatening to cause any employee to be deported, retaliating or discriminating in any way against current and former employees of the above-named Defendants based on their participating in or intention to participate the instant lawsuit, requesting any employees to sign documents compromising their rights in this lawsuit or cooperating in any way in prosecution of the lawsuit; and it is further

ORDERED that, sufficient reason having been shown therefor, pending the hearing of plaintiffs' application for a preliminary injunction, pursuant to Rule 65, Fed. R. Civ. P., the defendant is temporarily restrained and enjoined from terminating or suspending or threatening to terminate or suspend any employee, causing any employee to be deported or threatening to cause any employee to be deported, retaliating or discriminating in any way against current and former employees of the above-named Defendants based on their participating in or intention to participate the instant lawsuit, requesting any employees to sign documents compromising their rights in this lawsuit or cooperating in any way in prosecution of the lawsuit;

ORDERED that, Defendants are prohibited from speaking to employees of Defendants either directly or through another person acting on their behalf, regarding any communication ~~any employee has or will have~~ with Plaintiffs' counsel; and it is further

ORDERED that Defendants' failure to abide by the clear and unequivocal mandates set forth in this Order shall result in the striking of their pleadings; and it is further

ORDERED that security in the amount of \$ 1500 be posted by the plaintiff prior to May 12, 2015, at 5 o'clock in the after noon of

that day; and it is further

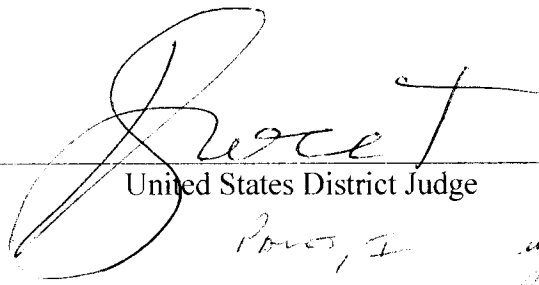
ORDERED that personal service of a copy of this order and annexed affidavit

✓ upon the defendant or his counsel on or before 5 o'clock in the pm noon, May 12, 2015 shall be deemed good and sufficient service thereof.

DATED: New York, New York

ISSUED: May 12, 2015

10:5 AM

  
\_\_\_\_\_  
United States District Judge  
Pasci, J.